BEFORE THE BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. 2008-1

Lisa Marie Layne 366 N. Curson Avenue, #1 Los Angeles, CA 90036

Registered Nurse License No. 538490

Respondent

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as it's Decision in the above entitled matter.

This Decision shall become effective on August 18, 2008.

IT IS SO ORDERED July 16, 2008.

President

Board of Registered Nursing Department of Consumer Affairs

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State of California

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1	EDMUND G. BROWN JR., Attorney General of the State of California KAREN B. CHAPPELLE			
2				
3	Supervising Deputy Attorney General WILLIAM R. TAYLOR, State Bar No. 222455			
4	Deputy Attorney General 300 So. Spring Street, Suite 1702 Los Angeles, CA 90013 Telephone: (213) 897-8764 Facsimile: (213) 897-2804			
5				
6	Attorneys for Complainant			
7	BEFORE THE BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS			
8				
9	STATE OF CAL	IFORNIA		
10	In the Matter of the Accusation Against:	Case No. 2008-1		
11	LISA MARIE LAYNE 366 North Curson Avenue, #1	OAH No. 2007080770		
12	Los Angeles, CA 90036	STIPULATED SETTLEMENT AND DISCIPLINARY ORDER		
13	Registered Nurse License No. 538490	DISCH BINARI ORDER		
14	Respondent.			
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16	IT IS HEREBY STIPULATED AND AGREED by and between the parties to the			
17	above-entitled proceedings that the following matter	s are true:		
18	<u>PARTIE</u>	<u>S</u>		
19	1. Ruth Ann Terry, M.P.H, R.N. (Complainant) is the Executive Officer of			
20	the Board of Registered Nursing. She has brought this action solely in her official capacity and is			
21	represented in this matter by Edmund G. Brown Jr., Attorney General of the State of California,			
22	by William R. Taylor, Deputy Attorney General.			
23	2. Respondent Lisa Marie Layne (Respondent) is represented in this			
24	proceeding by attorney Phyllis M. Gallagher, Esq., whose address is P.O. Box 1551,			
25	Wrightwood, CA 92397-1551.			
26	3. On or about November 14, 1997, the Board of Registered Nursing issued			
27	Registered Nurse License No. 538490 to Lisa Marie Layne (Respondent). The Registered Nurse			
28	License was in full force and effect at all times relevant to the charges brought in Accusation No.			

2008-1 and will expire on November 30, 2009, unless renewed.

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JURISDICTION

4. Accusation No. 2008-1 was filed before the Board of Registered Nursing, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on July 20, 2007. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. 2008-1 is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

- 5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 2008-1. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.
- 6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.
- 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

- 8. Respondent admits the truth of each and every charge and allegation in Accusation No. 2008-1.
- 9. Respondent agrees that her Registered Nurse License is subject to discipline and she agrees to be bound by the Board's imposition of discipline as set forth in the Disciplinary Order below.

 <u>CONTINGENCY</u>

- 10. The parties understand and agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the originals.
- 11. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Registered Nurse License No. 538490 issued to Respondent Lisa Marie Layne (Respondent) is revoked. However, the revocation is stayed and Respondent is placed on probation for three (3) years on the following terms and conditions.

Severability Clause. Each condition of probation contained herein is a separate and distinct condition. If any condition of this Order, or any application thereof, is declared unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other applications thereof, shall not be affected. Each condition of this Order shall separately be valid and enforceable to the fullest extent permitted by law.

1. **Obey All Laws.** Respondent shall obey all federal, state and local laws. A full and detailed account of any and all violations of law shall be reported by Respondent to the Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of compliance with this condition, Respondent shall submit completed fingerprint forms and fingerprint fees within 45 days of the effective date of the decision, unless previously submitted as part of the licensure application process.

Criminal Court Orders: If Respondent is under criminal court orders, including probation or parole, and the order is violated, this shall be deemed a violation of these probation conditions, and may result in the filing of an accusation and/or petition to revoke probation.

2. **Comply with the Board's Probation Program.** Respondent shall fully comply with the conditions of the Probation Program established by the Board and cooperate with representatives of the Board in its monitoring and investigation of the Respondent's

compliance with the Board's Probation Program. Respondent shall inform the Board in writing within no more than 15 days of any address change and shall at all times maintain an active, current license status with the Board, including during any period of suspension.

Upon successful completion of probation, Respondent's license shall be fully restored.

- 3. **Report in Person.** Respondent, during the period of probation, shall appear in person at interviews/meetings as directed by the Board or its designated representatives.
- 4. **Residency, Practice, or Licensure Outside of State.** Periods of residency or practice as a registered nurse outside of California shall not apply toward a reduction of this probation time period. Respondent's probation is tolled, if and when she resides outside of California. Respondent must provide written notice to the Board within 15 days of any change of residency or practice outside the state, and within 30 days prior to re-establishing residency or returning to practice in this state.

Respondent shall provide a list of all states and territories where she has ever been licensed as a registered nurse, vocational nurse, or practical nurse. Respondent shall further provide information regarding the status of each license and any changes in such license status during the term of probation. Respondent shall inform the Board if she applies for or obtains a new nursing license during the term of probation.

5. **Submit Written Reports.** Respondent, during the period of probation, shall submit or cause to be submitted such written reports/declarations and verification of actions under penalty of perjury, as required by the Board. These reports/declarations shall contain statements relative to Respondent's compliance with all the conditions of the Board's Probation Program. Respondent shall immediately execute all release of information forms as may be required by the Board or its representatives.

Respondent shall provide a copy of this Decision to the nursing regulatory agency in every state and territory in which she has a registered nurse license.

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6. **Function as a Registered Nurse.** Respondent, during the period of probation, shall engage in the practice of registered nursing in California for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

For purposes of compliance with the section, "engage in the practice of registered nursing" may include, when approved by the Board, volunteer work as a registered nurse, or work in any non-direct patient care position that requires licensure as a registered nurse.

The Board may require that advanced practice nurses engage in advanced practice nursing for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

If Respondent has not complied with this condition during the probationary term, and Respondent has presented sufficient documentation of her good faith efforts to comply with this condition, and if no other conditions have been violated, the Board, in its discretion, may grant an extension of Respondent's probation period up to one year without further hearing in order to comply with this condition. During the one year extension, all original conditions of probation shall apply.

7. **Employment Approval and Reporting Requirements.** Respondent shall obtain prior approval from the Board before commencing or continuing any employment, paid or voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all performance evaluations and other employment related reports as a registered nurse upon request of the Board.

Respondent shall provide a copy of this Decision to her employer and immediate supervisors prior to commencement of any nursing or other health care related employment.

In addition to the above, Respondent shall notify the Board in writing within seventy-two (72) hours after she obtains any nursing or other health care related employment. Respondent shall notify the Board in writing within seventy-two (72) hours after she is terminated or separated, regardless of cause, from any nursing, or other health care related employment with a full explanation of the circumstances surrounding the termination or separation.

8. **Supervision.** Respondent shall obtain prior approval from the Board regarding Respondent's level of supervision and/or collaboration before commencing or continuing any employment as a registered nurse, or education and training that includes patient care.

Respondent shall practice only under the direct supervision of a registered nurse in good standing (no current discipline) with the Board of Registered Nursing, unless alternative methods of supervision and/or collaboration (e.g., with an advanced practice nurse or physician) are approved.

Respondent's level of supervision and/or collaboration may include, but is not limited to the following:

- (a) Maximum The individual providing supervision and/or collaboration is present in the patient care area or in any other work setting at all times.
- (b) Moderate The individual providing supervision and/or collaboration is in the patient care unit or in any other work setting at least half the hours Respondent works.
- (c) Minimum The individual providing supervision and/or collaboration has person-to-person communication with Respondent at least twice during each shift worked.
- (d) Home Health Care If Respondent is approved to work in the home health care setting, the individual providing supervision and/or collaboration shall have person-to-person communication with Respondent as required by the Board each work day. Respondent shall maintain telephone or other telecommunication contact with the individual providing supervision and/or collaboration as required by the Board during each work day. The individual providing supervision and/or collaboration shall conduct, as required by the Board, periodic, on-site visits to patients' homes visited by Respondent with or without Respondent present.
- 9. **Employment Limitations.** Respondent shall not work for a nurse's registry, in any private duty position as a registered nurse, a temporary nurse placement agency, a traveling nurse, or for an in-house nursing pool.

Respondent shall not work for a licensed home health agency as a visiting nurse unless the registered nursing supervision and other protections for home visits have been

approved by the Board. Respondent shall not work in any other registered nursing occupation where home visits are required.

Respondent shall not work in any health care setting as a supervisor of registered nurses. The Board may additionally restrict Respondent from supervising licensed vocational nurses and/or unlicensed assistive personnel on a case-by-case basis.

Respondent shall not work as a faculty member in an approved school of nursing or as an instructor in a Board approved continuing education program.

Respondent shall work only on a regularly assigned, identified and predetermined worksite(s) and shall not work in a float capacity.

If Respondent is working or intends to work in excess of 40 hours per week, the Board may request documentation to determine whether there should be restrictions on the hours of work.

10. **Complete a Nursing Course(s).** Respondent, at her own expense, shall enroll and successfully complete a course(s) relevant to the practice of registered nursing no later than six months prior to the end of her probationary term.

Respondent shall obtain prior approval from the Board before enrolling in the course(s). Respondent shall submit to the Board the original transcripts or certificates of completion for the above required course(s). The Board shall return the original documents to Respondent after photocopying them for its records.

11. **Cost Recovery.** Respondent shall pay to the Board costs associated with its investigation and enforcement pursuant to Business and Professions Code section 125.3 in the amount of \$2,065.00. Respondent shall be permitted to pay these costs in a payment plan approved by the Board, with payments to be completed no later than three months prior to the end of the probation term.

If Respondent has not complied with this condition during the probationary term, and Respondent has presented sufficient documentation of her good faith efforts to comply with this condition, and if no other conditions have been violated, the Board, in its discretion, may grant an extension of Respondent's probation period up to one year without further hearing in

probation will apply.

12 Violation of Probation If Respondent violates the conditions of by

order to comply with this condition. During the one year extension, all original conditions of

12. **Violation of Probation.** If Respondent violates the conditions of her probation, the Board after giving Respondent notice and an opportunity to be heard, may set aside the stay order and impose the stayed discipline (revocation/suspension) of Respondent's license.

If during the period of probation, an accusation or petition to revoke probation has been filed against Respondent's license or the Attorney General's Office has been requested to prepare an accusation or petition to revoke probation against Respondent's license, the probationary period shall automatically be extended and shall not expire until the accusation or petition has been acted upon by the Board.

13. License Surrender. During Respondent's term of probation, if she ceases practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of probation, Respondent may surrender her license to the Board. The Board reserves the right to evaluate Respondent's request and to exercise its discretion whether to grant the request, or to take any other action deemed appropriate and reasonable under the circumstances, without further hearing. Upon formal acceptance of the tendered license and wall certificate, Respondent will no longer be subject to the conditions of probation.

Surrender of Respondent's license shall be considered a disciplinary action and shall become a part of Respondent's license history with the Board. A registered nurse whose license has been surrendered may petition the Board for reinstatement no sooner than the following minimum periods from the effective date of the disciplinary decision:

- (1) Two years for reinstatement of a license that was surrendered for any reason other than a mental or physical illness; or
 - (2) One year for a license surrendered for a mental or physical illness.
- 14. **Therapy or Counseling Program.** Respondent, at her expense, shall participate in an on-going counseling program until such time as the Board releases her from this requirement and only upon the recommendation of the counselor. Written progress reports from

FROM : PHYLL:S M GALLAGHER, ATTORNEY

FAX NO. : 760 249 3928

Apr. 24 2006 04:57PM P1

the counsolor will be required at various intervals. ACCEPTANCE 1 I have carefully read the above Stipulated Schlement and Disciplinary Order and 2 have fully discussed it with my stromey, Phyllis.M. Gallagher, Esq. I understand the supulation 3 and the officer it will have on my Registered Nurse License. I enter into this Stipulated 4 Souloment and Disciplinary Dider voluntarily, knowingly, and intelligently, and agree to be S bound by the Decision and Order of the Board of Registered Numing-6 8 9 LO 11 I have read and fully discussed with Respondent Lisa Marie Layrie the service and 12 conditions and space mailters contained in the above Stipulated Studential and Disciplinary 13 14 Order. I approved to form and content. 15 16 Phyllin M Lallinghes 17 13 Attorney for Respondent 19 111 20 311 21 /// 22 23 lil. 24 111 25 111 26. 27 III/// 28.

DOJ Matter ID: LA2006600360 60292751.wpd

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Registered Nursing.

EDMUND G. BROWN JR., Attorney General of the State of California

KAREN B. CHAPPELLE Supervising Deputy Attorney General

Deputy Attorney General

Attorneys for Complainant

1	EDMUND G. BROWN, JR., Attorney General		
2	of the State of California JENNIFER S. CADY		
3	Supervising Deputy Attorney General WILLIAM R. TAYLOR, State Bar No. 222455		
4	Deputy Attorney General California Department of Justice		
5	300 So. Spring Street, Suite 1702		
_	Telephone: (213) 897-8764		
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	BOARD OF REGISTERED NURSING		
9	STATE OF CALIFORNIA		
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11	In the Matter of the Accusation Against: Case No. 2008 - 1		
12	LISA MARIE LAYNE aka LISA MARIE PACIS		
13	aka LISA MAIRE PACIS-LAYNE 366 North Curson Avenue, #1 ACCUSATION		
14	Los Angeles, CA 90036		
15	Registered Nurse License No. 538490		
16	Respondent.		
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18	Complainant alleges:		
19	<u>PARTIES</u>		
20	1. Ruth Ann Terry, M.P.H., R.N. (Complainant) brings this Accusation		
21	solely in her official capacity as the Executive Officer of the Board of Registered Nursing,		
22	Department of Consumer Affairs (Board).		
23	2. On or about November 14, 1997, the Board issued Registered Nurse		
24	License Number 538490 to Lisa Marie Layne aka Lisa Marie Pacis aka Lisa Maire Pacis-Layne		
25	(Respondent). The Registered Nurse License was in full force and effect at all times relevant to		
26	the charges brought herein and will expire on November 30, 2007, unless renewed.		
27	/// · · · · · · · · · · · · · · · · · ·		
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JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

STATUTORY PROVISIONS

- 4. Section 2750 of the Business and Professions Code (Code) provides, in pertinent part, that the Board may discipline any-licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.
- 5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811(b) of the Code, the Board may renew an expired license at any time within eight years after the expiration.
 - 6. Section 2761 of the Code states, in pertinent part:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

- "(a) Unprofessional conduct, which includes, but is not limited to, the following:
- "(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action. . . ."
- 7. Section 118, subdivision (b), of the Code provides that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.
 - 8. Section 125.3 of the Code provides, in pertinent part, that the Board may

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request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

CAUSE FOR DISCIPLINE

(Discipline by New York State Board for Nursing)

- 9. Respondent is subject to disciplinary action under sections 2761(a) and 2761(a)(4), on the grounds of unprofessional conduct, in that effective November 3, 2005, in an action entitled In the Matter of the Disciplinary Proceeding Against Lisa Marie Layne, Registered Professional Nurse (Calendar No. 21503), the Board of Regents of The University of the State of New York ordered that Respondent's application to surrender her Registered Professional Nurse License No. 528783, issued by the New York State Education Department be adopted. The circumstances are as follows:
- 10. While employed as a registered professional nurse by Cross Country TravCorps, and during the course of an assignment at Beth Israel Hospital, located at 170 East End Avenue, New York, New YorkRespondent committed the following acts with fraudulent intent:
- In or about February 2002, Respondent made an entry on her payroll time A. sheet indicating that she had worked from 8:00 A.M. to 8:30 p.m. on February 12, 2002, and caused this time sheet to be submitted to TravCorps for payment, when in truth and in fact, and as Respondent well knew, she did not work at Beth Israel on that day:
- B. In or about March 2002, Respondent made an entry on her payroll time sheet indicating that she had worked from 8:00 A.M. to 8:30 P.M. on March 2, 2002, and caused this time sheet to be submitted to TravCorps for payment, when in truth and in fact, and as Respondent knew, she did not work at Beth Israel on that day;
- C. In or about March 2002, Respondent made an entry on her payroll time sheet indicating that she had worked from 8:00 A.M. to 8:30 P.M. on March 21, 2002, and caused this time sheet to be submitted to TravCorps for payment, when in truth and in fact, and as Respondent knew, she did not work at Beth Israel on that day;

Ţ	D. Between March 28, 2002 and April 9, 2002, Respondent caused to be			
2	submitted to TravCorps a performance evaluation for herself bearing favorable appraisals and the			
3	purported signature of Respondent's nurse manager, when in truth and in fact, and as Respondent			
4	knew, her manager never signed that form.			
5	<u>PRAYER</u>			
6	WHEREFORE, Complainant requests that a hearing be held on the matters herein			
7_	-alleged, and that following the hearing, the Board of Registered Nursing issue a decision:			
8	1. Revoking or suspending Registered Nurse License Number 538490, issued			
9	to Lisa Marie Layne aka Lisa Marie Pacis aka Lisa Maire Pacis-Layne.			
10	2. Ordering Lisa Marie Layne to pay the Board of Registered Nursing the			
11	reasonable costs of the investigation and enforcement of this case, pursuant to Business and			
12	Professions Code section 125.3;			
13	3. Taking such other and further action as deemed necessary and proper.			
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15	DATED: 7307			
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17	Reto Don'T			
18	RUTH ANN TERRY, M.P.H., R.N. Executive Officer			
19	Board of Registered Nursing Department of Consumer Affairs			
20	State of California			
21	Complainant			
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The University of the State of New York

IN THE MATTER

OF

LISA MARIE LAYNE (Registered Professional Nurse)

ORIGINAL
VOTE AND ORDER
NO. 21503

Upon the application of LISA MARIE LAYNE, under Calendar No. 21503, which application is made a part hereof, and in accordance with the provisions of Title VIII of the Education Law, it was

VOTED (November 3, 2005): That the application of LISA MARIE LAYNE, respondent, for permission to surrender respondent's license to practice as a registered professional nurse in the State of New York be granted; and that the Deputy Commissioner for the Professions be empowered to execute, for and on behalf of the Board of Regents, all orders necessary to carry out the terms of this vote;

and it is

ORDERED: That, pursuant to the above vote of the Board of Regents, said vote and the provisions thereof are hereby adopted and SO ORDERED, and it is further

ORDERED that this order shall take effect as of the date of the personal service of this order upon the respondent or five days after mailing by certified mail.

LISA MARIE LAYNE (21503)

IN WITNESS WHEREOF, I, Johanna
Duncan-Poitier, Deputy Commissioner
for the Professions, for and on
behalf of the State Education
Department and the Board of Regents,
do hereunto set my hand, at the City
of Albany, this 3rd day of November,
2005.

JOHANNA DUNCAN-POITIER
DEPUTY COMMISSIONER
FOR THE PROFESSIONS

VOTE	AND	ORDER
4 C T 13	DTIT.	CKLLIK

LISA MARIE LAYNE

CALENDAR NO. 21503

NEW YORK STATE EDUCATION DEPARTMENT OFFICE OF PROFESSIONAL DISCIPLINE STATE BOARD FOR NURSING

IN THE MATTER

of the

Disciplinary Proceeding

against

APPLICATION
TO SURRENDER
LICENSE

CAL. NO. 21503

LISA MARIE LAYNE

who is currently licensed to practice as a(n) registered professional nurse in the State of New York.

LISA MARIE LAYNE states:

That on or about December 13, 2001, I was licensed to practice as a registered professional nurse in the State of New York, having been issued license No. 528783 by the New York State Education Department.

My license to practice as a registered professional nurse in the State of New York is currently in inactive status. My current address is 6240 West Third Street, Apt. 427, Los Angeles, California 90036.

That I have been charged with one specification of professional misconduct, a copy of which is annexed hereto, made a part hereof, and marked as Exhibit "A".

I am applying to the Board of Regents for permission to surrender my license to practice as a registered professional nurse in the State of New York on the grounds that I do not contest the aforesaid specification, charging me with practicing

LISA MARIE LAYNE

the profession of nursing fraudulently (knowingly submitting falsified payroll timesheets on three separate occasions in order to receive payment for hours not actually worked, and knowingly submitting a falsified job performance evaluation).

I hereby make this application to the Board of Regents and request that it be granted.

I understand that in the event the application is denied by the Board of Regents, nothing contained herein shall be binding upon me or construed to be an admission of any act of misconduct alleged or charged against me. Such application shall not be used against me in any way and shall be kept in strict confidence during the pendency of the professional misconduct disciplinary proceeding, and such denial by the Board of Regents shall be without prejudice to the continuance of the disciplinary proceeding and the final determination by the Board of Regents pursuant to the provisions of the Education Law.

I agree that in the event the Board of Regents grants my application, an Order may be issued striking my name from the roster of registered professional nurses in the State of New York without further notice to me. I understand that if and when the Board of Regents grants this application, the entire application shall become a matter of public record.

LISA MARIE LAYNE

No promises of any kind were made to me. I am making this application of my own free will and accord and not under duress, compulsion or restraint of any kind or manner.

Respondent

EXHIBIT "A"

LISA MARIE LAYNE

SPECIFICATION OF PROFESSIONAL MISCONDUCT

Respondent is charged with practicing the profession of nursing fraudulently, within the purview and meaning of New York Education Law section 6509(2), in that:

While employed as a registered professional nurse by Cross Country TravCorps and, pursuant to an assignment by Cross Country TravCorps, working in that capacity at Beth Israel Hospital, 170 East End Avenue, New York, New York, Respondent committed the following acts:

A. In and about February 2002, Respondent, with fraudulent intent, made an entry on her payroll time sheet indicating that she had worked from 8:00 A.M. to 8:30 P.M. on February 14, 2002, when in truth and in fact, and as Respondent well knew, she did not work at Beth Israel Hospital on that day;

B. Thereafter, on a date between February 23, 2002 and March 1, 2002, Respondent, with fraudulent intent, caused to be submitted to Cross Country TravCorps for payment the aforementioned payroll time sheet indicating that she had worked February 14, 2002 from 8:00 A.M. to 8:30 P.M., when in truth and in fact, and as Respondent well knew, she did not work at Beth Israel Hospital on that day;

- C. In and about March, 2002, Respondent, with fraudulent intent, made an entry on her payroll time sheet indicating that she had worked from 8:00 A.M. to 8:30 P.M. on March 2, 2002, when in truth and in fact, and as Respondent well knew, she did not work at Beth Israel Hospital on that day;
- D. Thereafter, between March 8, 2002 and March 15, 2002, Respondent, with fraudulent intent, caused to be submitted to Cross Country TravCorps for payment the aforementioned payroll time sheet indicating that she had worked March 2, 2002 from 8:00 A.M. to 8:30 P.M., when in truth and in fact, and as Respondent well knew, she did not work at Beth Israel Hospital on that day;
- E. In and about March, 2002, Respondent, with fraudulent intent, made an entry on her payroll time sheet indicating that she had worked from 8:00 A.M. to 8:30 P.M. on March 21, 2002, when in truth and in fact, and as Respondent well knew, she did not work at Beth Israel Hospital on that day;
- F. Thereafter, between March 20, 2002 and March 29, 2002, Respondent, with fraudulent intent, caused to be submitted to Cross Country TravCorps for payment the aforementioned payroll time sheet indicating that she had worked March 21, 2002 from 8:00 A.M. to 8:30 P.M.,

when in truth and in fact, and as Respondent well knew, she did not work at Beth Israel Hospital on that day;

G. Between March 28, 2002 and April 9, 2002, Respondent, with fraudulent intent, caused to be submitted to her employer, Cross Country TravCorps, a performance evaluation form for herself bearing favorable appraisals and the purported signature of Respondent's nurse manager, when in truth and in fact, and as Respondent well knew, her nurse manager never signed that form.

NEW YORK STATE EDUCATION DEPARTMENT OFFICE OF PROFESSIONAL DISCIPLINE STATE BOARD FOR NURSING

IN THE MATTER

of the

Disciplinary Proceeding

against

APPLICATION

LISA MARIE LAYNE

CAL. NO. 21503

who is currently licensed to practice as a(n) registered professional nurse in the State of New York.

The undersigned agree to the Application to Surrender.

2005_

Dated:

Office of Professional Discipline

/jeh